

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460




Office of Pesticide Programs

**MEMORANDUM**

1/20/2021

**SUBJECT:** Acute Toxicity Review for Bioprotect P Concentrate, EPA Reg. No.: 93354-R

**FROM:** Joseph Williams Jr., Ph.D.  
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**THRU:** Jenny Tao, Senior Scientist/Team Leader (Acute Toxicology)  01/25/2021  
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**TO:** Eric Miederhoff, PM Team 31 / Karen Leavy  
Regulatory Management Branch I  
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Registrant: Viaclean Technologies		
Decision No.: 565903	Submission No.: 1057023	E-Sub No.: -
DP No.: 459480		Action Code: A531
MRID No(s).: 47984101-05 and 46921202		

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
107401	27668-52-6	3-(trimethoxysilyl) propyldimethyloctadecyl ammonium chloride	5.0%
		Other Ingredients	95.0
		Total	100%

## **I. BACKGROUND**

The Registrant, Viaclean Technologies, has submitted an application for the pesticide registration of their product: *Bioprotect P Concentrate*, EPA Reg. No. 93354-R, for which the registrant is claiming substantially similarity in composition and labeling to *HM 4005 Antimicrobial*, EPA Reg. No. 83019-3 and is citing its acute toxicity data to support the proposed product.

Based on the A531 PRIA category, review of acute toxicity data is not applicable for this Data Package (DP 459480). Thus, this memorandum addresses product similarity as it affects data bridging but does not evaluate the data support itself.

This is an end-use product, intended for antimicrobial use in industrial and agricultural applications.

## **II. FINDINGS/CONCLUSIONS**

The proposed product is substantially similar to *HM 4005 Antimicrobial*, EPA Reg. No. 83019-3, of which the registrant has cited the acute toxicity data to support the registration of the proposed product. The Agency has previously reviewed and accepted the cited acute toxicity data (DP375052; 04/14/2010).

The acute toxicity profile for the cited product *HM 4005 Antimicrobial*, EPA Reg. No. 83019-3 satisfies the product-specific acute toxicity data requirements of the proposed product, EPA Reg. No. 93354-R. The resulting Toxicity Categories (as previously determined for Reg. No. 83019-3) are listed in the table below.

The acute toxicity profile of *Bioprotect P Concentrate*, EPA Reg. No. 93354-R, is currently:

<b>Study</b>	<b>MRID</b>	<b>Toxicity Category</b>	<b>Status</b>
Acute Oral Toxicity	47984101	IV	Cited
Acute Dermal Toxicity	47984102	IV	Cited
Acute Inhalation Toxicity	47984103	IV	Cited
Primary Eye Irritation	47984104	II	Cited
Primary Skin Irritation	47984105	IV	Cited
Dermal Sensitization	46921202	Nonsensitizer	Cited

**Conclusion:** The registrant has satisfied the acute toxicity data requirements to support the registration of *Bioprotect P Concentrate*, EPA Reg. No. 93354-R.

### **III. PRODUCT LABELING**

1. Signal Word: WARNING

2. The statement, "Keep Out of Reach of Children (KOROC)", is required. It should appear immediately above the front-panel signal word "WARNING".

3. The Agency's Label Review Manual (<https://www.epa.gov/pesticide-registration/label-review-manual>) indicates the following human-hazard precautionary statements:

#### **PRECAUTIONARY STATEMENTS**

##### **Hazards to Humans and Domestic Animals**

**WARNING** Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear such as goggles, face shield, or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

4. FIRST AID:

#### **If in Eyes:**

- Hold eye open and rinse slowly and gently with water for 10-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

#### **If on Skin or Clothing:**

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment.

#### **If Inhaled:**

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferable mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment.